

**Remarks****I. Administrative Overview**

Claims 1-20, 23-53 and 56-76 were previously presented. Claims 1, 11, 23-24, 26, 33-34, 36-37, 44, 56, 57, 66 and 68 are hereby amended, and Claim 67 is cancelled. Upon entry of the present amendments, Claims 1-20, 23-53, 56-66 and 68-76 are pending. No new matter has been introduced.

Applicants respectfully request reconsideration and withdrawal of all rejections levied against the pending claims.

**II. Specification Objections**

The Specification has been objected to for failing to provide support for Claims 34-43, 44-53, 56, 57-65 and 66. Applicants respectfully direct the Examiner's attention toward paragraph 83 of the present disclosure which states in part that:

[t]he present invention may be provided as one or more computer-readable programs embodied on or in one or more articles of manufacture. The article of manufacture may be a floppy disk, a hard disk, a compact disc, a digital versatile disc, a flash memory card, a PROM, a RAM, a ROM, or a magnetic tape.

Each of these articles of manufacture is a computer readable medium as it is defined by one of skill in the art. Applicants respectfully submit that the phrase "computer readable medium" is supported by the present disclosure. Therefore, Applicants respectfully request that the Examiner reconsider and withdraw all Specification objections.

**III. Rejections under 35 U.S.C. § 112**

Claims 34-43, 44-53, 56, 57-65 and 66 are rejected under 35 U.S.C. § 112, first paragraph for failing to comply with the written description requirement. Claim 34 has been amended to recite "a computer readable medium." Applicants respectfully disagree with the Examiner's contention that the phrase "computer readable medium" is not supported by the present disclosure. As stated above, paragraph 83 of the present disclosure lists articles of manufacture that are computer readable media as it is defined by one of skill in the art. Thus, Applicants

respectfully submit that the present disclosure supports all elements of Claims 34-43, 44-53, 56, 57-65 and 66. For this reason, Applicants respectfully request that the Examiner reconsider and withdraw all rejections made under 35 U.S.C. § 112.

#### **IV. Rejections under 35 U.S.C. § 101**

Claims 34-43 are rejected under 35 U.S.C. § 101 for failing to claim statutory subject matter. Applicants respectfully submit that Claims 34-43, as previously presented claim statutory subject matter. Nevertheless, Claim 34 has been amended. Applicants respectfully submit that the amendment made to Claim 34 overcomes this rejection. Accordingly, Applicants respectfully request that the Examiner withdraw all rejections made under 35 U.S.C. § 101.

#### **V. Rejections under 35 U.S.C. § 103(a)**

Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 are rejected under 35 U.S.C. § 103 as unpatentable over European Patent Application No. EP1187022 to Arteaga, et al. (“Arteaga”) in view of U.S. Publication No. 2005/0091302 to Soin, et al. (“Soin”). Applicants respectfully submit that Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 as previously presented are patentable over Arteaga in view of Soin. Nevertheless, Claims 1, 11, 23, 43, 46, 44 and 56 have been amended to more clearly recite the claimed invention. Applicants respectfully submit that Claims 1, 3, 10-12, 15, 23, 34, 36, 43-45, 48 and 56 as amended are patentable over Arteaga in view of Soin

A claimed invention lacks an inventive step in light of at least one reference when the at least one reference, either alone or in combination with another reference, teaches or suggests each and every element of the claimed invention. Applicants respectfully submit that any combination of Arteaga and Soin fails to teach or suggest each and every element of the claimed invention.

Arteaga fails to disclose an event notification regarding a device in communication with the client or proxy client as is required by each independent claim. Arteaga describes a system where the client device is any client such as a Palm or hand-held telephone and where an application on the client device intercepts events and sends them to a server. In Arteaga, the device is the client, therefore the device is not a device that is separate from the client. Thus Arteaga does not describe a device that is in communication with the client or proxy client,

because the device and the client described in Arteaga are the same thing. *See Arteaga*, paragraph 28, and 42-44. Arteaga, therefore, does not describe a device in communication with a client or proxy client as is required by each independent claim.

Further, Arteaga fails to disclose redirecting the event notification to the server before an operating system on the client can handle the event, as is required by each independent claim. There is no suggestion in Arteaga that the actions of the operating system on the client influence when the event notification is sent to the server. Arteaga therefore fails to teach or even suggest redirecting the event notification to the server before an operating system on the client can handle the event.

For the above mentioned reasons, Arteaga fails to teach or suggest each and every element of Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68.

Soin, like Arteaga, fails to teach or suggest redirecting the event notification to the server before an operating system on the client can handle the event, as is required by each independent claim. Soin describes universal plug-and-play, a method for “issuing a Universal Plug and Play search” and listening for a device to advertise itself. *See Soin*, paragraph 113. Soin does not teach or even suggest redirecting an event notification much less redirecting the event notification to the server before an operating system on the client can handle the event. Thus, Soin fails to teach or suggest each and every element of Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68.

For the above-mentioned reasons, any combination of Arteaga and Soin fails to contemplate each element of independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68. Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68 are therefore patentable over Arteaga in view of Soin. Claims 3, 10-12, 15, 36, 43, 45 and 48 are dependent, respectively, on one of Claims 1, 23, 34, 44 and 56. Thus, Claims 3, 10-12, 15, 36, 43, 45 and 48 are also patentable over Arteaga in view of Soin.

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and in further view of U.S. Patent Number 7,171,478 to Lueckhoff (“Lueckhoff”). Applicants traverse this rejection and respectfully submit that

Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 as previously presented are patentable over Arteaga in view of Soin and in further view of Lueckhoff.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68 are patentable and in a condition for allowance. Because Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 depend from and incorporate all the patentable subject matter of Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites Lueckhoff merely for the purpose of addressing generating a context identifier and binding the context identifier to the event notification. As with Arteaga and Soin, Lueckhoff also fails to teach or suggest an event notification regarding a device in communication with the client or proxy client, and redirecting the event notification to the server before an operating system on the client can handle the event. Thus, Lueckhoff fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 2, 4, 13-14, 16, 35, 37, 46-47 and 49 under 35 U.S.C. §103.

Claims 5, 7, 17, 19, 38, 40, 50 and 52

Claims 5, 7, 17, 19, 38, 40, 50 and 52 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and in further view of U.S. Patent Number 6,982,656 to Coppinger (“Coppinger”). Applicants traverse this rejection and respectfully submit that Claims 5, 7, 17, 19, 38, 40, 50 and 52 as previously presented are patentable over Arteaga in view of Soin and in further view of Coppinger.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68 are patentable and in a condition for allowance. Because Claims 5, 7, 17, 19, 38, 40, 50 and 52 depend from and incorporate all the patentable subject matter of Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites Coppinger merely for the purpose of addressing generating an event notification

as a result of a device arrival. As with Arteaga and Soin, Coppinger also fails to teach or suggest an event notification regarding a device in communication with the client or proxy client, and redirecting the event notification to the server before an operating system on the client can handle the event. Thus, Coppinger fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 5, 7, 17, 19, 38, 40, 50 and 52 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 5, 7, 17, 19, 38, 40, 50 and 52 under 35 U.S.C. §103.

Claims 6, 8, 9, 18, 20, 39, 41, 42, 51 and 53

Claims 6, 8, 18, 20, 39, 41, 51 and 53 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin, in view of Coppinger and in further view of U.S. Publication Number 2002/0114004 to Ferlitsch (“Ferlitsch”). Claims 9 and 42 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and in further view of Ferlitsch. Applicants traverse this rejection and respectfully submit that Claims 6, 8, 9, 18, 20, 39, 41, 42, 51 and 53 as previously presented are patentable over any combination of Arteaga, Soin, Coppinger and Ferlitsch.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68 are patentable and in a condition for allowance. Because Claims 6, 8, 9, 18, 20, 39, 41, 42, 51 and 53 depend from and incorporate all the patentable subject matter of Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites Ferlitsch merely for the purpose of addressing sending an open command to a device. As with Arteaga and Soin, Ferlitsch also fails to teach or suggest an event notification regarding a device in communication with the client or proxy client, and redirecting the event notification to the server before an operating system on the client can handle the event. Thus, Ferlitsch fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 6, 8, 9, 18, 20, 39, 41, 42, 51 and 53 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 6, 8, 9, 18, 20, 39, 41, 42, 51 and 53 under 35 U.S.C. §103.

Claims 24, 26, 32-33, 57, 59, 65-69, 70-73, 75

Claims 24, 26, 57, 59, 67-68 and 75 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin and in further view of U.S. Publication Number 2002/0159419 to Morris (“Morris”). Claims 69 and 71 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin in view of Morris and in further view of Coppinger. Claims 70 and 72 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin in view of Morris in view of Ferlitsch and in further view of Coppinger. Claim 73 is rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin in view of Morris and in further view of Ferlitsch. Claims 25, 27-31, 58, 60-64, 74 and 76 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin in view of Morris and in further view of Lueckhoff. Claims 32-33 and 65-66 are rejected under 35 U.S.C. § 103 as unpatentable over Arteaga in view of Soin in view of Morris and in further view of Lueckhoff. Applicants respectfully submit that Claim 67 has been cancelled. Applicants traverse this rejection and respectfully submit that Claims 24, 26, 32-33, 57, 59, 65-66, 68-69, 70-73 and 75 as previously presented are patentable over any combination of Arteaga, Soin, Coppinger, Lueckhoff, Morris and Ferlitsch.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68 are patentable and in a condition for allowance. Because Claims 26, 32, 59, 65, 68, 69, 70-73 and 75 depend from and incorporate all the patentable subject matter of Claims 1, 11, 23, 24, 33, 34, 44, 56, 57, 66 and 68, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites Morris merely for the purpose of addressing emulating a plug-and-play event. As with Arteaga, Soin, Coppinger, Ferlitsch and Lueckhoff, Morris also fails to teach or suggest an event notification regarding a device in communication with the client or proxy client, and redirecting the event notification to the server before an operating system on the client can handle the event. Thus, Morris fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 24, 26, 32-33, 57, 59, 65-66, 68-69, 70-73 and 75 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 24, 26, 32-33, 57, 59, 65-66, 68-69, 70-73 and 75 under 35 U.S.C. §103.

## **VI. Conclusion**

Applicants contend that each of the Examiner's rejections have been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted,  
CHOATE, HALL & STEWART LLP

Date: December 22, 2008

/Kellan D. Ponikiewicz/  
Kellan D. Ponikiewicz  
Registration Number: 59,701

Patent Group  
CHOATE, HALL & STEWART LLP  
Two International Place  
Boston, MA 02110  
Phone: (617) 248-5000  
Fax: (617) 502-5002